

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION  
APRIL 2024 SESSION

UNITED STATES OF AMERICA

v.

RAHYEEM TYQUAN BAKER

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Criminal No. 7:24cr13

**INDICTMENT**

**In Violation of:**

18 U.S.C. § 922(g)(1)

**COUNT ONE**

The Grand Jury charges that:

1. On or about January 25, 2022, in the Western District of Virginia, the defendant, RAHYEEM TYQUAN BAKER, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, a Romarm/Cugir, model Draco, 7.62mm, pistol (S/N: ROA21DG-2684), said firearm having been shipped and transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF FORFEITURE**

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants shall forfeit to the United States:

a. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

**a. Firearm and Ammunition**

- i. Romarm/Cugir, model Draco, 7.62mm, pistol (Serial Number ROA21DG-2684) and ammunition from within this firearm.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL this the 18 day of April 2024.

s/FOREPERSON  
FOREPERSON

  
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CHRISTOPHER R. KAVANAUGH  
UNITED STATES ATTORNEY